

**From:** "William R. Ellis" <WREllis@WoodLamping.com>  
**To:** "Michael Roberts" <mroberts@Graydon.com>  
**Date:** 1/20/04 10:03AM  
**Subject:** Jeffries Daubert hearing

Mike, I think it is best for both of us to organize the Daubert hearing by issue. If you agree, I suggest that we deal with PET and SPECT scan evidence first. Dr. Frey is available in the early afternoon of the 29th and you have Dr. Pretorius the next day, as I understand it. We should also be able to deal with Fuller on the 29th by oral argument and with Hartings and Bullard on the 30th. I have not yet confirmed their availability but will try to do so today. The Hep. B issue, I suspect will take the most time and should have its own day. We had suggested the 9th because it was a date offered by the court, however if that is not a good day for you, please advise if any other day that week would work. We should then call the court and make sure the judge is in agreement.

I have an infectious disease specialist with significant experience in vaccines whom I intend to call in response to Dr. Geier and all Hep B evidence used by any of the physicians. As soon as he has finished his review of the material you recently provided, and issues a report I will forward his report and supporting data to you. He is, unfortunately tied up participating in a program for the World Health Organization in Italy and will not be available until early February. Please advise if this can be worked out amicably between us. We can then call the court and make the necessary arrangements with Judge Beckwith's schedule. Thank you in advance for your kind cooperation.

William R. Ellis

**CC:** "Peter M. Burrell" <pmburrell@WoodLamping.com>